## **PUBLIC DISCLOSURE**

OCTOBER 30, 2003

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

THE COMMUNITY BANK, A MASSACHUSETTS CO-OPERATIVE BANK

1265 BELMONT STREET BROCKTON, MA 02401

DIVISION OF BANKS ONE SOUTH STATION BOSTON, MA 02110

NOTE:

This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this financial institution.

#### GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires the Massachusetts Division of Banks (Division) to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the needs of its entire assessment area, including low and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the Division must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **THE COMMUNITY BANK, A MASSACHUSETTS CO-OPERATIVE BANK** (The Community Bank or the bank) prepared by the Division, the institution's supervisory agency.

# **INSTITUTION'S CRA RATING: This institution is rated "Satisfactory"**

The primary factors supporting the bank's overall rating include:

## Net Loan to deposit and share ratio

The bank's average net loan to deposit ratio has averaged 80.4 percent for the period from December 31, 2001 to September 30, 2003. This ratio is reasonable considering the strong competition in this area and the bank's resources. Therefore, the bank's performance is considered to meet the standards for satisfactory performance.

#### Credit extended Inside and Outside the assessment area

The bank has extended an excellent percentage of loans within its assessment area. A total of 91.1 percent of its Home Mortgage Disclosure Act (HMDA) reportable loans were granted within its assessment area. Therefore, the bank is considered to exceed the standards for a satisfactory performance in this category.

#### Distribution of Credit among Individual of Different Incomes

The bank has made a reasonable effort in meeting the credit needs of individuals of all income levels including those of low and moderate-income. The bank granted 14.8 percent of its HMDA reportable loans to low and moderate-income borrowers in 2002 and 22.2 percent as of year-to-date June 30, 2003. Based on the above, the bank is considered to meet the standards for a satisfactory performance in this category.

## **Geographic Distribution of Loans**

A review of the geographic distribution of loans among the various census tracts contained in the bank's assessment area revealed that the dispersion of loans in the low and moderate-income tracts does not compare to the assessment area and falls below all other HMDA reportable lenders in its area. It should be noted that the majority of these tracts are located in the Cities of Fall River and New Bedford, which have low owner-occupancy rates. In addition, the bank has no branch presence in either of these cities, which also plays a roll in the low volume of lending in low and moderate-income tracts. The distribution of loans in middle and upper tracts appears reasonable. Therefore, the bank is considered to meet the standards for a satisfactory performance in this category.

# Response to Complaints and Fair Lending

The bank has not received any CRA related complaints since the prior examination and no discriminatory acts or practices were noted during this examination. In addition, the bank's fair lending performance was found to be satisfactory at this time.

## PERFORMANCE CONTEXT

## **Description of Institution**

The Community Bank is a state-chartered financial institution headquartered in Brockton, Massachusetts. The Community Bank is a wholly owned subsidiary of Campello Bancorp. In addition to its headquarters, the bank operates four other full service offices, two of which are also located in Brockton, one in the Town of Bridgewater, and one in the Town of Sandwich. The main office and the branch offices offer drive-up tellers. All offices have Automated Teller Machines (ATMs). In addition, the bank is a member of the SUM network that allows the bank's ATM cardholders free use at member institution ATMs. Hours of operation are convenient and include extended hours on Thursday and Friday evenings and Saturday mornings.

The bank is a participant in the Basic Banking for Massachusetts program and offers a low cost savings program, which requires \$10 minimum and has no fees. In addition, the bank offers a basic checking product that has no minimum balance and no fee.

The bank participates in the "Savings Makes Cents" program sponsored by the Massachusetts State Treasurer's Office. At the present time, the bank is offering this program to four schools in Brockton and three schools in Sandwich.

The bank maintains Interest on Lawyers' Trust Accounts (IOLTA). Attorneys and law firms maintain these accounts for the short term holding of clients' funds. Interest earned on these accounts is remitted to the IOLTA committee, which distributes funds to local charities to provide low or no cost legal services to low-income individuals. This program benefits over 100,000 low-income individuals a year in the areas of consumer, family, education, disability, and elder services. The bank has paid interest to Massachusetts IOLTA, in the amount of \$24,528 in 2002.

The Community Bank operates in a very competitive market. Local competitors include but are not limited to the following: Abington Savings Bank; Brockton Credit Union; Fleet National Bank; BankBoston; Citizens Bank of Massachusetts; North Easton Savings Bank; Sovereign Bank and Rockland Trust Company, as well as representatives of numerous regional and national mortgage companies. The market influence from these institutions appears to be significant, and as a result, serves to keep the bank's rates and services offered competitive.

The Federal Deposit Insurance Corporation (FDIC) last examined the bank for compliance with CRA on April 30, 2002. That examination resulted in a satisfactory rating.

According to the September 30, 2003, Federal Financial Institution Examination Council (FFIEC) Quarterly Call Report, the bank had \$244,315,000 in assets; of which gross loans represented \$194,801,000 or 79.7 percent of total assets. Approximately, 97.2 percent of the bank's loan portfolio is in real estate loans with 65.0 percent of those loans secured by 1-4 family real estate. Refer to the following table for details of the bank's loan portfolio by type.

## **Loan Portfolio Composition**

Loan Type	Amount (000s)	Percent
One to Four-Family Residential Mortgages	\$126,691	65.0
Equity Lines of Credit	\$7,693	4.0
Commercial Real Estate	\$30,872	15.9
Construction and Land Development	\$24,038	12.3
Commercial and Industrial	\$4,301	2.2
Consumer Loans	\$1,206	0.6
Total Gross Loans	\$194,801	100.0

Source: September 30, 2003 Consolidated Report of Condition.

## **Description of Assessment Area**

CRA requires financial institutions to define an assessment area within which its CRA performance will be evaluated. The bank's assessment area contains 60 cities and towns located in the Boston, Brockton, Barnstable, Prov-Fall River, New Bedford and Non Metropolitan Statistical Areas (MSAs). The Office of Management and Budget establishes MSAs for statistical reporting purposes by federal agencies.

The City of Brockton is geographically located 20 miles south of the City of Boston. Brockton has evolved from a traditional manufacturing urban community into a major wholesale and retail trade, and services community similar to many of the surrounding towns in this part of southeastern Massachusetts.

The Community Bank's assessment area consists of the following Cities and Towns in the following MSAs:

Boston MSA: the City of Taunton and the Towns of Berkley, Carver, Dighton, Duxbury, Hanover, Kingston, Mansfield, Marshfield, Norton, Norwell, Pembroke, Plymouth, Rockland, Scituate and Wareham.

Brockton MSA: the City of Brockton, and the Towns of Abington, Bridgewater, East Bridgewater, Easton, Halifax, Hanson, Lakeville, Middleborough, Plympton, Raynham, West Bridgewater, and Whitman.

Barnstable MSA: the Towns of Barnstable, Brewster, Chatham, Dennis, Eastham, Harwich, Mashpee, Orleans, Sandwich and Yarmouth.

Prov-Fall River MSA: the cities of Fall River and Attleboro and the Towns of North Attleborough, Rehoboth, Seekonk, Somerset, Swansea, and Westport.

New Bedford MSA: the City of New Bedford and the Towns of Acushnet, Dartmouth, Fairhaven, Freetown, Marion, Mattapoisett, and Rochester.

Non MSA: the Towns of Bourne, Falmouth, Provincetown, Truro and Wellfleet.

#### 2002 ASSESSMENT AREA

Using the 1990 census data, the bank's assessment area was comprised of 244 census tracts, of which 4 or 1.6%, were designated as low-income; 55 or 22.5%, moderate-income; 142 or 58.2%, middle-income; 38 or 15.6%, upper-income and 5 or 2.1% with no income designation. The low-income census tracts are located in Brockton (2), New Bedford (1), and Fall River (1). The moderate-income census tracts are located in Fall River (16), New Bedford (13), Brockton (7), Taunton (5), Wareham (4), Barnstable (2), and one each in Dennis, Mashpee, Bourne, Provincetown, Bridgewater, Middleborough, Plymouth and Attleboro.

Assessment area housing data, based on 1990 Census Data, indicated that there are 492,565 housing units, of which 54.4 percent are owner-occupied, 27.7% are rental and 17.9% are vacant. The area's total population is 1,097,919 persons. The area contains 403,424 households, of which 9.1% are below poverty level, 30.0% receive social security and 8.5% receive public assistance.

#### 2003 ASSESSMENT AREA

Utilizing the 2000 census data, the bank's assessment area contains 251 census tracts. Of these 11 or 4.4%, were designated as low-income; 56 or 22.3%, moderate-income; 130 or 51.8%, middle-income; 53 or 21.1%, upper-income and 1 or 0.4% with no income designation. The low-income census tracts are located in New Bedford (7), Barnstable (2), Brockton (1), and Fall River (1). The moderate-income census tracts are located in Fall River (15), New Bedford (14), Brockton (11), Taunton (6), Wareham (4), Plymouth (2), and one each in Barnstable, Dennis, Bourne, and Provincetown.

Assessment area housing data, based on 2000 Census Data, indicated that there are 532,791 housing units, of which 59.7 percent are owner-occupied, 26.1% are rental and 14.2% are vacant. The area's total population is 1,198,798 persons. The area contains 457,126 households, of which 9.1% are below poverty level, 29.4% receive social security and 3.0% receive public assistance.

## Change in Demographics

In 2003, the US Census Bureau released its revised demographics based upon 2000 census data. The following table reflects both the 1990 and 2000 census data of The Community Bank's assessment area by census tract income groupings. This information is being included as a precursor for future examinations as well as for the bank's future reference. In addition, the percentage change in the number of census tracts by income grouping is also reflected.

Change in Assessment Area Demographics						
<b>Census Tracts</b>	1990 Cer	1990 Census Data   2000 (		sus Data	% Change in	
	#	%	# %		Number of Census	
					Tracts	
Low	4	1.6	11	4.4	50.0	
Moderate	55	22.5	56	22.3	1.8	
Middle	142	58.2	130	51.8	-8.4	
Upper	38	15.6	53	21.1	39.5	
NA	5	2.1	1	0.4	-80.0	
Total	244	100.0	251	100.0	2.9	

Source: PCI Services, Inc., CRA Wiz Software.

Twenty-seven of the 60 cities and towns in the assessment area had one or more changes in the make-up of its census tracts. The census tracts with no income designation that were eliminated from the census were a ship in Falmouth, a hospital in Taunton, a power plant in Somerset, a ship in New Bedford and cranberry bogs in Marshfield. The Bridgewater Correctional Institution located in Bridgewater was also given a no income designation in the 2000 census.

Housing data from the November 24, 2003 housing statistics from the Bankers and Tradesman Publication indicate that the year-to-date October 31, 2003, median housing values in the communities served by the bank range from a low of \$179,950 in New Bedford to a high of \$550,000 in Duxbury.

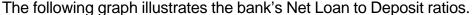
Two community contacts conducted during the examination provided relevant information on the assessment area. The contacts were conducted in Brockton and included an organization whose primary goals are to attract new businesses and grow existing businesses in Brockton. The second contact was with an organization whose mission is to provide education, health, civic, social, and human services to the Cape Verdean residents in the greater Brockton area.

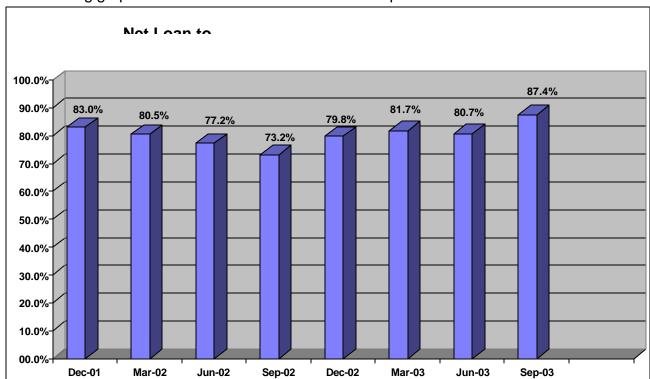
## PERFORMANCE CRITERIA

## 1. NET LOAN TO DEPOSIT ANALYSIS

An analysis of The Community Bank's net loan to deposit ratio was performed during the examination. The calculation incorporated eight quarters of the bank's net loan to total deposit figures utilizing the FDIC quarterly call reports. This review included the quarters ending December 31, 2001, through September 30, 2003.

The bank's average loan to deposit ratio during the period under examination was determined to be 80.4%. The ratio has fluctuated from a low of 73.2% on September 30, 2002 to a high of 87.4% on September 30, 2003. The increase in the ratio for the period of June 30, 2003 to September 30, 2003 can be attributed to an 11.9% growth in loans and a 3.3% growth in deposits.





An analysis of the bank's Peer Group, which includes institutions with assets of \$100 million to \$300 million, for the period of December 31, 2000, through June 30, 2003, indicated an average net loan to deposit ratio of 79.7%. The lowest percentage was 74.6% on June 30, 2003 and the highest was 85.9% on December 31, 2000.

Based on the above information and The Community Bank's capacity to lend, the strong market competition from other institutions in the assessment area, demographic and economic factors present in the assessment area, and the lending opportunities available in the assessment area, the bank's loan to deposit ratio meets the standards for satisfactory performance.

# 2. COMPARISON OF CREDIT EXTENDED INSIDE AND OUTSIDE OF THE ASSESSMENT AREA(S)

Data regarding the bank's HMDA reportable lending activity for 2002 and year-to-date June 30, 2003 was reviewed to determine the proportion of loans originated within the assessment area by number and dollar amount. Lending data was obtained from the bank's Loan Application Register (LAR) filed under the provisions of the Home Mortgage Disclosure Act (HMDA).

For the period reviewed, the bank originated 1,061 HMDA-reportable loans totaling \$168 million, which is a very good volume for an institution of its size. This also represents a significant increase from the 574 loans originated in 2000 and 2001. Of these loans 965 representing 91.0 percent of the total loans were originated in the assessment area. By dollar amount, these loans totaled \$149 million or 88.8 percent. Of the 965 loans originated within the assessment area, 798 or 82.7 percent were for refinances and 128 or 13.3 percent were for conventional home purchases.

Brockton accounted for the largest percentage of originations by number with 18.2 percent, followed by Bridgewater with 11.5 percent. Brockton also accounted for the largest dollar volume of originations with 12.8 percent, followed by Bridgewater with 11.2 percent. Refer to the following table for additional information regarding the bank's HMDA-reportable lending, by both number and dollar volume.

Distribution of HMDA Reportable Loans Inside and Outside of the Assessment Area								
Year	ear Inside					Out	side	
	Number	of Loans		n Loans 10s)	Number of Loans		Dollars in Loans (000s)	
	#	%	\$	%	#	%	\$	%
2002	527	90.2	84,724	87.5	57	9.8	12,082	12.5
YTD 2003	438	91.8	64,375	90.7	39	8.2	6,631	9.3
Total	965	91.0	149,099	88.8	96	9.0	18,713	11.2

Source: HMDA /LAR, CRA Wiz

It should be noted that the bank has a large assessment area and has penetrated 62.9 percent of the census tracts in its assessment area.

Based on the above information, it is evident that the vast majority of the number and dollar amount of the bank's HMDA reportable loans have been extended within its assessment area. Therefore the bank's level of lending within its assessment area exceeds the standards for satisfactory performance.

## 3. LENDING TO BORROWERS OF DIFFERENT INCOMES

An analysis of HMDA reportable loans extended within the bank's assessment area, among various income levels during 2002 and year-to-date June 30, 2003 was conducted. Originations were categorized by the ratio of the applicant's reported incomes to the 2002 and 2003 estimated median family incomes of the Boston, Brockton, Barnstable, Prov-Fall River, New Bedford and Non MSAs, depending on the location of the property. These income figures are based on estimated Department of Housing and Urban Development (HUD) information. Refer to the following table for a breakdown of the estimated 2002 and 2003 HUD median family incomes.

MSA	2002	2003
Barnstable-Yarmouth	\$56,500	\$58,700
Boston	\$74,200	\$80,800
Brockton	\$63,500	\$70,300
New Bedford	\$47,500	\$52,700
Non-MSA Areas	\$51,200	\$60,300
Providence-Fall River-Warwick RI-MA	\$54,100	\$58,400

Low income is defined by the US Census Bureau as income below 50 percent of the median family income level for the MSA; moderate income is defined as 50 to 79 percent of the median family income; middle income is defined as income between 80 and 119 percent of the median family income; and upper income is defined as income greater than 120 percent of the median family income.

The following table compares the bank's 2002 borrower income distribution to that of the HMDA aggregate lenders. Furthermore, the table also compares these presentations to the distribution of family households within the assessment area.

Distribution of HMDA loans by Borrower Income							
Median Family Income Level	% Total Households Per 1990 Census Data	Aggregate Lending Data (% of #)	20	002			
		2002	#	%			
Low	24.2	3.8	11	2.1			
Moderate	15.1	14.5	69	13.1			
Middle	19.7	24.5	160	30.4			
Upper	41.0	42.6	271	51.4			
N/A		14.6	16	3.0			
Total	100.0	100.0	527	100.0			

Source: 1990 U.S. Census, HMDA/LAR, and HMDA Aggregate Data

During 2002, The Community Bank extended 11 loans to low-income borrowers representing 2.1 percent of the total loans originated within the assessment area. This is well below the 23.0 percent of low-income households within the assessment area and just slightly below the aggregate lenders' 3.8 percent. However, this is reasonable based on the price of housing in the assessment area and the overall market conditions which make credit opportunities for low-income borrowers limited.

In 2002, the bank originated 69 loans to moderate-income borrowers, representing 13.1 percent of the total originations within the assessment area. This percentage is slightly below the 15.1 percent of moderate-income households within the assessment area and the aggregates' 14.5 percent.

The following table compares the bank's year-to-date June 30, 2003 borrower income distribution to the distribution of family households within the assessment area.

Distribution of HMDA loans by Borrower Income						
Median Family Income Level	% Total Households per 2000 Census Data		o-date 003			
		#	\$			
Low	23.0	17	3.9			
Moderate	15.3	80	18.3			
Middle	19.8	122	27.9			
Upper	41.9	216	49.3			
N/A		3	0.6			
Total	100.0	438	100.0			

Source: 2000 U.S. Census, HMDA/LAR, and HMDA Aggregate Data

In 2003, The Community Bank extended 17 loans to low-income borrowers representing 3.9 percent of the total loans originated within the assessment area. This is well below the 23.0 percent of low-income households within the assessment area. However, this can be attributed to the fact that approximately 9.1% of these individuals are living below the poverty level. In addition, the price of purchasing a home in this market makes it difficult for a low-income individual to qualify for a home loan.

In 2003, the bank originated 80 loans to moderate-income borrowers, representing 18.3 percent of the total originations within the assessment area. This percentage is above the 15.3 percent of moderate-income households within the assessment area.

The distribution of HMDA-reportable loans by borrower income demonstrates the bank's willingness to lend to borrowers of all income levels including those of low and moderate-income. Therefore, the bank is considered to meet the standards for a satisfactory performance in this category.

#### 4. GEOGRAPHIC DISTRIBUTION OF LOANS

The table below shows the number of HMDA reportable loans in comparison to the number of owner-occupied housing units in each census tract. In addition, the bank's HMDA reportable loans were compared to that of all other HMDA-reporters in the assessment area. Other HMDA reporters include bank and non-bank entities such as large national banking companies, other local banks, credit unions and mortgage companies. The most recent data available for this analysis relates to calendar year 2002. Refer to the following table for details.

Distribution of HMDA Loans by Income Category of the Census Tract						
Census Tract Income Level	% Total Owner- Occupied Housing Units per 1990 Census Data	Aggregate Lending Data (% of #)	20	002		
		2002	#	%		
Low	0.3	0.3	2	0.4		
Moderate	10.8	7.7	24	4.6		
Middle	67.4	68.4	389	73.8		
Upper	21.5	23.6	112	21.2		
Total	100.0	100.0	527	100.0		

Source: 1990 U.S. Census, HMDA/LAR, and HMDA Aggregate Data

As shown in the above table, 0.4 percent of the bank's total loans for the period under review were within low-income census tracts and slightly higher than the assessment area's owner-occupancy rate of 0.3 percent. The 4.6 percent of the loans originated within the moderate-income census tracts is lower than the 10.8 percent of owner-occupied housing units in the assessment area. In addition, the above data shows that the number of loans in middle-income census tracts is higher than the percentage of owner-occupied housing units in these areas.

As demonstrated above, the percentage of the bank's lending activity in low-income census tracts for 2002 is higher than the aggregate. However, it represents only two loans. The percentage of the bank's lending activity in moderate-income census tracts was lower than that of the aggregate In addition, the above table also demonstrates that the bank's HMDA-reportable loans in middle-income census tracts was higher than the aggregate and upper-income census tracts was proportionate to the aggregate. However, this criterion mainly focuses on the bank's lending in low and moderate-income census tracts.

The following table compares the bank's 2003 geographic lending distribution (through June 30, 2003) to distribution of owner occupied unites based on 2000 Census data.

Distribution of HMDA Loans by Income Category of the Census Tract						
Census Tract Income Level	% Total Owner-Occupied Housing Units per 2000 Census Data	-	to-date 003			
		#	\$			
Low	0.6	1	0.2			
Moderate	11.7	38	8.7			
Middle	61.4	278	63.5			
Upper	26.3	121	27.6			
N/A						
Total	100.0	438	100.0			

Source: 2000 U.S. Census, HMDA/LAR, and HMDA Aggregate Data

As shown in the above table one loan or 0.2 percent of the bank's total loans for the period under review was within the bank's 11 low-income census tracts and is slightly lower than the assessment area's owner-occupancy rate of 0.6 percent. The 8.7 percent of loans originated within the moderate-income census tracts is lower than the 11.7 percent of owner-occupied housing units in the assessment area. It should be noted that eight of the low-income census tracts and 29 of the moderate-income census tracts are located in the Cities of Fall River and New Bedford where the bank has no branch presence. In addition, the above data shows that the number of loans in middle-income census tracts is higher than the percentage of owner-occupied housing units in these areas and the upper-income loans are proportionate.

Based on the above information, the bank is considered to have an adequate geographic distribution of loans in its assessment area including the low and moderate-income areas. Hence, the bank meets the standards for a satisfactory performance.

## 5. REVIEW OF COMPLAINTS/FAIR LENDING

#### **REVIEW OF COMPLAINTS**

The Community Bank has not received any complaints regarding its CRA performance since the previous examination

#### FAIR LENDING POLICIES AND PRACTICES

The Community Bank 's fair lending data was reviewed to determine how it relates to the guidelines established by the Division's Regulatory Bulletin 2.3-101, the Division's Community Reinvestment and Fair Lending Policy.

Bank management ascertains the credit needs of the assessment area through their involvement in several area organizations and programs. The bank markets it services and products to the community through a variety of mediums including print, television, radio, and the Internet. Several financial seminars are conducted throughout the bank's assessment area in order to make potential customers aware of the services the bank provides.

The Compliance Officer performs an annual review of HMDA with the use of Bank Maps.

To ensure that the circumstances of a denial are based on fact and that the process is consistent in all cases, all denied applications are reviewed by two loan officers and signed by both in concurrence.

## **MINORITY APPLICATION FLOW**

The bank received (for 2002 and year-to date June 30, 2003 combined) a total of 44 mortgage applications from various minority groups, representing 4.0 percent of all residential loan applications received. Of these, 35 or 79.5 percent were originated. The HMDA aggregate lenders in 2002 received 5.4 percent of all the residential applications from various minority groups. In comparison, The Community Bank's minority applicants in 2002 represented 4.2 percent of all applicants. The table following provides further details.

MINORITY APPLICATION FLOW								
Racial Designation	Aggregate Data 2002		20	02	20	03	To	tals
	#	%	#	%	#	%	#	%
Native American	502	0.3	4	0.7	0	0.0	4	0.4
Asian	845	0.5	5	0.8	3	0.6	8	0.7
Black	2,771	1.8	5	0.8	5	1.0	10	0.9
Hispanic	1.252	0.8	1	0.3	2	0.4	3	0.3
Joint	1,407	0.9	5	0.8	3	0.6	8	0.7
Other	1,704	1.1	5	0.8	6	1.2	11	1.0
Total Minority	8,481	5.4	25	4.2	19	3.8	44	4.0
White	97,854	62.6	512	85.9	456	88.9	968	87.3
N/A	49,976	32.0	59	9.9	38	7.3	97	8.7
Total	156,311	100.0	596	100.0	513	100.0	1,109	100.0

In addition, the institution's minority application flow is compared to the racial composition of the assessment area. The table details the assessment area's racial composition for the 1990 and 2000 U.S. Census.

Change in Assessment Area Racial Demographics						
Race	1990 Cens	sus Data	2000 Cen	sus Data	% Change in Number	
	#	%	#	%	of Persons	
Native American	2,819	0.3	3,194	0.3	13.3	
Asian	7,843	0.7	13,058	1.1	66.5	
Black	24,614	2.2	33,595	2.8	36.5	
Hispanic	22,830	2.1	33,177	2.8	45.3	
Other	13,626	1.2	45,459	3.7	233.6	
White	1,026,187	93.5	1,070,315	89.3	4.3	
Total Persons	1,097,919	100.0	1,198,798	100.0	9.1	
	<u>-</u>					
Total Minority	71,732	6.5	128,483	10.7	79.1	

The assessment area's total population increased by 9.1 percent while the total minority population increased by 79.1 percent. The Asian and Hispanic communities increased by 66.5 and 45.3 percent, respectively. However, the racial group called "other" experienced the largest increase of any minority category with a 233.3 percent growth. Given the racial composition and the HMDA aggregate application data, the bank's level of attracting minority applicants is considered to be reasonable with the exception of the Hispanic and Black groups that were below the assessment area demographics.

In addition, a review was conducted for compliance with fair lending laws and regulations and no violations of the substantive provisions of anti-discriminatory laws and regulations were identified.

## THE COMMONWEALTH OF MASSACHUSETTS

To the COMMISSIONER OF BANKS:

THIS IS TO CERTIFY, that the report of examination of the

# THE COMMUNITY BANK, A MASSACHUSETTS CO-OPERATIVE BANK

for compliance with applicable consumer and fair lending rules and regulations and the Community Reinvestment Act (CRA), as of the close of business **OCTOBER 30, 2003**, has been read to or by the undersigned and the matters referred to therein will have our immediate attention.

				<del></del>				
A majority of the Board of Directors/Trustees								
Dated at	this	5	day of	20				
Dated at	this	S	day of	20				

#### PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, and the Uniform Interagency Community Reinvestment Act (CRA) Guidelines for Disclosure of Written Evaluations require all financial institutions to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:
  - "You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at (Address at main office)."
  - [Please Note: If the institution has more than one local community, each office (other than off-premises electronic deposit facilities) in that community shall also include the address of the designated office for that assessment area.]
- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agency, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.